

United States District Court  
Southern District of Texas  
FILED

RHONDA K JOHNSON(PLAINTIFF)  
1219 BEECHBEND DR  
MISSOURI CITY TX 77489

UNITED STATES DISTRICT COURT  
for Southern district of Texas Houston division

OCT 22 2018

David J. Bradley, Clerk of Court

Case no.4:18-cv-01253

V

SEPT.25,2018

Susan R Solis,et al(DEFENDANTS

September 25,2018

(PLAINTIFF RESPOND TO 9/12/2018 US CERTIFIED MAIL)

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CLERK(JUDGE KEITH E)  
UNITED STATESDIST COURT  
P.O.BOX 61010  
HOUSTON,TEXAS 77208

CC HONORABLE LYNN N HUGHES

PLAINTIFF RHONDA K JOHNSON RESPOND TO DEFENDANT SUSAN R SOLIS  
MOTION TO DISMISS FOR FAILURE TO STATE CLAIM,ALTERNATIVELY,MOTION FOR MORE  
DEFINITE STATEMENT

PLAINTIFF,RHONDA K JOHNSON FILES MOTION TO DENY DEFENDANT SUSAN R SOLIS  
MOTION TO DISMISS FOR FAILURE TO STATE CLAIM AND MORE DEFINITE STATEMENT  
PURSUANT TO FEDERAL RULES COURT PROCEDURES DO NOT SUPPORT

#### A.BACKGROUND

1.FACTUAL STATEMENTS OF FACTS WERE SUBMITTED AT TIME COMPLAINT WAS FILED.  
HOWEVER; ENCLOSED COPY TO REVIEW.

GRANDSONS WERE PLACED IN STATE CUSTODY UNDER FALSE PRETENSE IS  
TRUE...DEFENDANTS REMOVED BOYS BASED ON HEARASAY AND MOTHER REFUSING TO  
REUNITE AS A COUPLE WITH OLDEST BOY FATHER.DEFENDANTS KNOWINGLY AND  
INTENTIONALLY TOOK ACTIONS WITHOUT PROBABLE CAUSES...NEVER EVER HAVE  
BOYS BEEN 'UNPROTECTED'. ANOTHER FACTOR, BABY BOY FATHER HAD GREAT  
RELATIONSHIP WITH HIS SON IN 'FORT BEND COUNTY'(CURRENT WITH HIS  
CHILDSUPPORT AS WELL) DEFENDANTS KNOWINGLY CONTINUED TO PURSUE CASE FOR  
FINANCIAL GAINS AND OUT OF RETELIATION. INTENTIONALLY REFUSED BY OBJECTION  
TO FATHER ATTEMPTS TO SPEAK ON HIS BEHALF AND EXPLAIN AN FALSE REPORTED  
SITUATION AND TO INVESTIGATE FAMILY(BOTH GRANDPARENTS(MATERNAL AND  
PATERNAL)INFORMATION PROVIDED BEFORE TOXIC TRAMATIZING INNOCENT BOYS AND  
MANY OTHERS REPORTED BY MEDIA AND FORMER COMMISSIONER JOHN  
SPECIA....KNOWING MATERNAL GRANDMOTHER ATTENDED 1<sup>ST</sup> MEETING AND INITIATED  
A APPOINTMENT 12NOON MEETING AT COURT...DEFENDANTS REFUSED TO NOTIFY OF  
COURT HEARING,THE REQUESTED INTERVENTION AND A FAMILY MEETING TO PROVIDE  
FACTUAL INFORMATION HAVING THE BOYS BEST INTEREST IN HEART AND MIND.  
CONCERNING AMENDED TO ORIGINAL COMPLAINT',ONLY AMENDED TO COMPLAINT  
WERE THOSE NAMES AND AGENCIES TO BE SUMMONED .

2.HOWEVER; MS./ATTY SUSAN RYAN SOLIS LIST OF VIOLATIONS OF STATE AND FAMILY  
RULES AND REGULATIONS INCLUDE, 1<sup>ST</sup> FAMILY RULE..'REMAIN PROFESSIONAL AT ALL  
TIMES', BELIGERANTS,(UNPROFESSIONAL REPRESENTATION),FALSE COURT REPORTING  
FOR PERSONAL AND FINANCIAL GAINS, SPAIRING THE 'REPUTATION'OF TEXAS CHILD  
PROTECTION SERVICES AS SHE WAS OVERHEARD STATING,ABUSIVE IN POWERS, *obstruction of Justice*  
KNOWINGLY AND INTENTIONALLY COHARSING FAMILY MEMBERS TO UNCLEAR AND  
FALSE OPTIONS, IGNORE FAMILY REQUEST FOR INTERVENTION, NEVER ALLOWED  
FAMILY MEETING AS REQUESTED AND RECORDED STATING, USED BLURR AND SLURRED  
STATEMENTS AND RESPONSES IN COURT INTENTIONALLY FOR FAMILY MEMBERS AS

WELL AS THE COURT REPORTER TO TRANSLATE IN THE TRANSCRIPT INACCURATELY AND INCORRECT RECORDS, VERBAL ABUSE TO LESS FORTUNATE IN UNDERSTANDING HER TDCPS TERMINOLOGIES, BELITTERING AND DEGRADING TACTICS, RETALIATIONS, COHARSING FAMILY FOR PERSONAL GAIN, MISMANAGE STATE OF TEXAS FEDERAL FUNDING INASMUCH NOT USE FOR INTENTIONAL IN WHICH PROVIDED. INTENTIONALLY PREVENTED FAMILY MEETING FOR UNNECESSARY FUNDING AND DISTRIBUTION TO ALL CO-PARTNERS(INCLUDING JUDGE GLEN DEVLIN)CAUSING DANGEROUS OUTCOME DUE TO DEFENDANT'S NEGLIGENCE IN FALSE REPORTING DECISIONS

1.ALL SUED VIOLATED STATE OF TEXAS AS WELL AS FAMILY LAWS 'RULES,AND REGULATIONS AS SET AND UNDER OATH ..AGREED.

3. BASIS FOR CONFERRING FEDERAL JURISDICTION TO COMPLAINT DUE TO THE FEDERAL COURT RULES VIOLATING ...DISCRIMINATION ACTIONS, ABUSE TO A DISABILITY ACT,PURJURY,RETALIATIONS,COHARSING.ETC . ALL AND OTHER PLEADINGS COMPLAINTS OF PLAINTIFF ARE BASIS FOR CONFERRING FEDERAL JURISDICTION.

#### B.ARGUMENT & AUTHORITIES

4.MOTION TO DENY DISMISS WOULD BE PROPERLY GRANTED IN PURSUANT TO RULES OF FEDERAL RULES AND PROCEDURES.

YES, CASE HAS MERIT BASIS FOR FEDERAL JURISDICTION:

CONSTITUTIONAL 14<sup>TH</sup> AMENDMENT RIGHTS WERE VIOLATED  
THE BOYS NEVER WERE UNPROTECTED...AS THE CORE TDCPS EXISTANCE.  
FAMILY HEARASAY DISPUTES ,NOT GROUNDS TO INTERFERE AND USE ABUSIVE POWERS (CAUSING STATE OF TEXAS TO HAVE AN OVER CROWED/OVERLOAD FOSTER CARE CASES WHICH LACK THE ADAQUATE MANPOWER TO THOROUGHLY INVESTIGATE.1.AND 2...THE COMPLAINT HAS FACTS TO DISPUTE AS WELL AS THE COMPLAINT SUPPLEMENTED WHICH CAN AND WILL BE PROVEN FACTS 3.COURT WILL FIND AND RESOLVE THAT THE RULE12B CARRIES GREAT MERITS AND USFEDERAL DISTRICT COURT BEARS THE BURDEN OF PROOF IN SOUTHERN US DISTRICT COURT FOR SOUTHER REGION JURISDICTION.

5.PLAINTIFF NOT SOLELY COMPLAINT OF A FINAL STATE COURT JUDGEMENT WHICH WAS DONE UNDER FALSE,MISLEADING ,INTIMIDATING PRACTICES,MILICIOUS AND INJUSTIFY INTENTIONALLY WITHOUT JUST CAUSE NOR PROPER NOTICES..HOWEVER; US FEDERAL LAWS WERE VIOLATED.ESPECIALLY WHEN THE RULES FIND BASES ON FALSIFIED INFORMATION FOR COURT APPOINTED ATTORNEYS AND CASE MANAGERS INTENTIONALLY WITHHOLDING PERTIENT INFORMATION FOR COURT FINAL DECISIONS. PRETENDING TO HAVE THE BOYS BEST INTEREST IN HEART AND MIND, YOU PRRTEND TO BE APART FROM TDCPS OPTIONS WHEN IN FACT DEFENDANTS COHEARSED TO THEIR(YOUR) BENEFITS.

WHEN THE ACTION WHICH WERE TAKEN IN

6. PLAINTIFF SUIT SHOULD NOT BE DISMISSED BECAUSE OF IMMUNITY PROVIDED UNDER THE TEXAS FAMILY CODE...1/ATTY SUSAN SOLIS CONSCIOUSLY AND RECKLESSLY DISREGARDED THE TEXAS FAMILY CODES ESPECIALLY WITH THE SAFETY IN MIND FOR THE BOYS(OTHER CHILDREN AS WELL) INASMUCH AS THE FAMILY ACCEPTED AND TRUSTED THE STATE OF TEXAS REPRESENTATIVE WOULD MAKE DECISIONS BASED ON 1/FAMILY MEETINGS 2/NOTIFYING ALL INTERESTING PARTIES EXPRESSED 3/FABRICATING REPORTS TO STATE OF TEXAS OFFICIAL IN BAD FAITH AND PRE MALICE ALREADY PREDETERMINED.3/IN FACT, THE CASE SHOULD BE CONSIDERED GROSS NEGLIGENCE SINCE THE FACTUAL ALLEGATIONS CAN BE PROVEN.

\*\*SEE BARBARA MARKS VS STATE OF TEXAS FEB2018(FOX 26NEWS)

7.PLAINTIFF HAS NUMEROUS FACTS TO STATE IN ADDITIONS TO THE MANY FILED ALONG WITH COMPLAINT ALREADY..THEREFORE SUIT SHOULD NOT BE DISMISSED.

ONCE DEPOSITION AND INTERROGATION SCHEDULED, MORE IDENTITIES OF EACH INVOLVED ATTORNEY VIOLATIONS AND THE FACTUAL BASIS OF THEIR INTENTIONALLY CAUSES OF ACTIONS WILL BE REVEALED.

8. LIKEWISE, PLAINTIFF JOHNSON STATUTORY AND FACTUAL BASIS FOR RELIEF SEEKED ACTUALLY HAS NO DOLLAR\$AMOUNT . THERE IS NO MONETARY DAMAGES TO TECHNICALLY REPAY THE BOYS & THEIR FAMILY EXPENSES... NOT EVEN MILLIONS OF DOLLARS. HOWEVER; THE AMOUNT REQUEST IS SOME RELIEF TO RECOVER SOME OF OUT OF POCKET EXPENSES (INCLUDING LEGAL FEES) MOREOVER; PLAINTIFF REQUEST THE STATE ORDERED CONCERNING DISMISSING EMPLOYEES BARES MUCH GROUND. (MURWORTH FACILITY IN HOUSTON (JUST TO NAME 1 OR MANY OTHERS) ALREADY DISMISSED SEVERAL REGIONAL MANAGERS.

9. REQUEST FOR MORE DEFINITE STATEMENT: ENCLOSED

1/ COURT AND CAUSE NUMBER (PROVIDED)

2/ NAME AND RELATIONSHIP TO PLAINTIFF JOHNSON (PROVIDED)

3/ SPECIFIC ACTS AND OMISSIONS BY DEFENDANTS (PROVIDED)

4/ THE STATUTORY AND JURISDICTION BASIS ALLOWING PLAINTIFF TO PURSUE SUIT IN FEDERAL COURT AND REQUEST DAMAGES ON BEHALF OF FAMILY MEMBERS (PROVIDED)

5/ FACTS AND CAUSES OF ACTIONS AGAINST SOLIS (DEFENDANT)... PROVIDED. STARTING WITH UNPROFESSIONISM, COHARSING, INTIMIDATING, ... ETC

6/ AGAINST DEFENDANT SOLIS DAMAGES TO RECOVER... TBD!  
CONCLUSION;

10. THIS CASE ACTION SHOULD NOT BE DISMISSED AS PLAINTIFF SORT TO COMMUNICATE WITH DEFENDANT (SOLIS) AND THE OTHERS SUMMONS, NUMEROUS TIME BEFORE BEING COMPELLED TO PURSUE IN COURT AT THIS POINT. HOWEVER; DEFINITE STATEMENT IS AVAILABLE AS RECORDED APRIL 2018. PLAINTIFF OBEYED THE RULES AND PROCEDURES SET IN FILING AND THEREFORE REQUEST DEFENDANT REQUEST TO DISMISS CLAIMS AGAINST HER IN ENTIRETY BE DENIED.

TRUTHFULLY RESPECTFULLY,

  
RHONDA K JOHNSON

RHONDA K JOHNSON

1219 BEECHBEND DR  
MISSOURI CITY, TX 77489  
2814371888

CONSIDER ADVISED OF PLAINTIFF  
LEGAL REPRESENTATIVE (September 28, 2018)  
KHA LAWYERS.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A TRUE AND CORRECT COPY OF THE FOREGOING HAS BEEN SERVED US CERTIFIED MAIL #70172620000041608839 ALONG WITH RETURN RECEIPT 9590940242078121164196 TO SUSAN SOLIS 2800 E BROADWAY STE C518 PEARLAND TX 77581

cc State Bar of Texas